

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

-----X
ANDREA BROOKER and JERMAL D. :
BROOKER, :
: :
Plaintiffs, :
: : Civil Action No. 02-CV-2651 (CSG)
v. :
: :
TEXTRON, INC. and TEXTRON, INC. :
a/k/a d/b/a TEXTRON LYCOMING and :
TEXTRON LYCOMING and AVCO :
CORPORATION, :
: :
Defendants. :
-----X

DEFENDANTS' MOTION FOR SUMMARY JUDGMENT

Pursuant to Rule 56 of the Federal Rules of Civil Procedure, Defendants Textron Inc., Textron Lycoming and Avco Corporation hereby move this Court to enter summary judgment against Plaintiffs Andrea Brooker and Jermal Brooker ("Plaintiffs") on all of the claims raised in the Complaint, for the reason that no genuine issue of material fact exists and that Defendants are entitled to judgment against Plaintiffs as a matter of law. The basis for this Motion is set forth in the accompanying Memorandum of Points and Authorities and the supporting exhibits and declarations, which are incorporated by reference herein.

WHEREFORE, Defendants respectfully request that this Court grant their Motion for Summary Judgment with regards to all of the claims raised in the Complaint.

A proposed order is attached hereto.

Dated: November 18, 2003

Respectfully submitted,

Alison B. Marshall, Esq.
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(412) 391-3939 (telephone)
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*Associate Counsel of Record Pursuant to Local
Rule 83.5.2*

Attorneys for Defendants Textron Inc., Textron
Lycoming and Avco Corporation

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CORPORATION, :
: :
Defendants. :
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ORDER

AND NOW, this _____ day of _____, 2003, upon consideration of
Defendants' Motion for Summary Judgment and all papers and arguments submitted in support
thereof and in opposition to, it is

ORDERED

that Defendants' Motion is GRANTED, judgment is entered for Textron Inc., Textron
Lycoming and Avco Corporation and Plaintiffs' causes of action are dismissed with prejudice.

BY THE COURT:

United States District Judge

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CORPORATION, :
: :
Defendants. :
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DEFENDANT TEXTRON INC.'S MOTION FOR SUMMARY JUDGMENT

Pursuant to Rule 56 of the Federal Rules of Civil Procedure, Defendant Textron Inc. hereby moves this Court to enter summary judgment against Plaintiffs Andrea Brooker and Jermal Brooker ("Plaintiffs") on all of the claims raised in the Complaint, for the reason that no genuine issue of material fact exists and that Defendant is entitled to judgment against Plaintiffs as a matter of law. The basis for this Motion is set forth in the accompanying Memorandum of Points and Authorities and the supporting exhibits and declarations, which are incorporated by reference herein.

WHEREFORE, Defendant respectfully requests that this Court grant its Motion for Summary Judgment with regards to all of the claims raised in the Complaint.

A proposed order is attached hereto.

Dated: November 18, 2003

Respectfully submitted,

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*Associate Counsel of Record Pursuant to Local
Rule 83.5.2*

Attorneys for Defendant Textron Inc.

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BROOKER, :
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Plaintiffs, :
: : Civil Action No. 02-CV-2651 (CSG)
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: :
TEXTRON, INC. and TEXTRON, INC. :
a/k/a d/b/a TEXTRON LYCOMING and :
TEXTRON LYCOMING and AVCO :
CORPORATION, :
: :
Defendants. :
-----X

ORDER

AND NOW, this _____ day of _____, 2003, upon consideration of
Defendant Textron Inc.'s Motion for Summary Judgment and all papers and arguments submitted
in support thereof and in opposition to, it is

ORDERED

that Defendant's Motion is GRANTED, judgment is entered for Textron Inc. and
Plaintiffs' causes of action are dismissed with prejudice.

BY THE COURT:

United States District Judge